

From: Mia, Marcia
Sent: Wednesday, November 21, 2018 03:57 PM
To: Marsh, Karen
CC: Witosky, Matthew
Subject: RE: 0000/0000a Storage Tank Applicability

Ex. 5 Deliberative Process (DP)

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: Marsh, Karen
Sent: Wednesday, November 21, 2018 10:20 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Subject: FW: 0000/0000a Storage Tank Applicability

Any thoughts? Obviously I'm cleaning out my email today.

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Witosky, Matthew

Sent: Monday, October 29, 2018 12:28 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: 0000/0000a Storage Tank Applicability

Hi Karen,

Ex. 5 Deliberative Process (DP)

Hope that helps,

Matt

From: Marsh, Karen

Sent: Monday, October 29, 2018 11:31 AM
To: Witosky, Matthew <Witosky.Matthew@epa.gov>
Subject: FW: 0000/0000a Storage Tank Applicability

Thoughts?

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

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Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Jamie Nease [mailto:jnease@hlpengineering.com]

Sent: Monday, October 29, 2018 11:00 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: 0000/0000a Storage Tank Applicability

Karen-

Can you please direct me to the right person if you are not it?

If a storage tank is determined to be not applicable to 0000/0000a since PTE is less than 6 TPY VOC considering enforceable limits in a permit, would applicability have to be reconsidered after upset conditions?

uple storage tanks at a facility that are controlled by a lit flare. The post-control emissions are made enforceable by a permit and as such the tanks are not subject to the rule since emissions are less than 6 TPY. If there is an upset with the flare, i.e. the flare goes out and tank emission are vented for a short period, should applicability be reassessed to include uncontrolled emissions during that downtime? Or is applicability to the rule made only once, during the 30-day period after start of production?

Thanks for any insight you can provide.

Jamie N. Nease

Air Compliance Manager

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